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JUDGE SHADUR

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

08CR

373

UNITED STATES OF AMERICA

vs.

KATHERINE McCANN

No.

MAGISTRATE JUDGE COX

Violations: Title 18, United States Code,
Sections 1028(a)(1), 1028(a)(2) and 2.

COUNT ONE

FILED

J.N

MAY X 8 2008

The SPECIAL JUNE 2007 GRAND JURY charges:

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

1. At all times material to this indictment:
a. Defendant KATHERINE McCANN was employed by the Illinois Secretary of State's Office ("SOS").

b. As part of her duties as an SOS employee, McCANN was authorized to produce and issue Illinois state identification cards.

c. Individuals applying for Illinois state identification cards were required to show forms of identification in order to establish that they were in fact the individual whose name and identifiers would appear on the identification card.

2. On or about December 3, 2007, at Bridgeview, in the Northern District of Illinois, Eastern Division,

KATHERINE McCANN,

defendant herein, knowingly and without lawful authority produced, and caused to be produced, in and affecting commerce, a false identification document, namely, an Illinois State Identification Card in the name of Individual A, but which contained a photograph of a person that defendant knew was not Individual A;

In violation of Title 18, United States Code, Section 1028(a)(1).

COUNTS TWO THROUGH TEN

The SPECIAL JUNE 2007 GRAND JURY further charges:

1. The allegations contained in paragraph one of Count One of this indictment are re-alleged as though fully set forth herein.

2. On or about the dates set forth below, at Bridgeview, in the Northern District of Illinois, Eastern Division,

KATHERINE McCANN,

defendant herein, knowingly and without lawful authority produced, and caused to be produced, in and affecting commerce, false identification documents, namely, Illinois State Identification Cards in the names of Individuals identified below but which contained photographs of persons that defendant knew were not the Individuals named on the Identification cards, each identification card produced in this manner on the dates set forth below constituting a separate offense:

<i>Count</i>	<i>Date</i>	<i>Individual</i>
Two	December 13, 2007	B
Three	December 26, 2007	C
Four	December 28, 2007	D
Five	January 4, 2008	E
Six	January 10, 2008	F
Seven	January 11, 2008	G
Eight	February 8, 2008	H
Nine	February 29, 2008	I
Ten	February 29, 2008	J

All in violation of Title 18, United States Code, Section 1028(a)(1).

COUNTS ELEVEN THROUGH TWENTY

The SPECIAL JUNE 2007 GRAND JURY further charges:

1. The allegations contained in paragraph one of Count One of this Indictment are re-alleged as if fully set forth herein.

2. On or about the dates set forth below, at Bridgeview, in the Northern District of Illinois, Eastern Division,

KATHERINE McCANN,

defendant herein, knowingly and without lawful authority transferred, and caused to be transferred, in and affecting interstate commerce, false identification documents, knowing that such documents were produced without lawful authority, namely, Illinois State Identification Cards in the names of the Individuals identified below but which contained photographs of persons that defendant knew were not the Individuals named on the Identification cards, each identification card transferred in this manner on the dates set forth below constituting a separate offense:

<i>Count</i>	<i>Date</i>	<i>Individual</i>
Eleven	December 3, 2007	A
Twelve	December 13, 2007	B
Thirteen	December 26, 2007	C
Fourteen	December 28, 2007	D
Fifteen	January 4, 2008	E
Sixteen	January 10, 2008	F
Seventeen	January 11, 2008	G
Eighteen	February 8, 2008	H
Nineteen	February 29, 2008	I

Twenty	February 29, 2008	J
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All in violation of Title 18, United States Code, Sections 1028(a)(2) and 2.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY